

MEMORANDUM OF EX PARTE COMMUNICATION WITH THE DEPARTMENT OF ENERGY

Date of Meeting: October 27, 2016

Submitted via email: expartecommunications@hq.doe.gov

Attendees:

Ashley Armstrong, Department of Energy

Smitha Vemuri, Department of Energy

Johanna Jochum, Department of Energy

Steven A. Tice, UPG VP Engineering, Johnson Controls

Jeffrey N. Nichols, UPG Director Engineering, Johnson Controls

Chris M. Forth, UPG Director Residential & Commercial Product Management, Johnson Controls

William F. McQuade, Executive Director, Global Energy & Sustainability, Johnson Controls

Christopher E. Ware, Legal Director Global DX, Air Systems, Johnson Controls

Summary of what was discussed:

JCI sought a meeting with DOE staff to discuss issues relevant to the August 24, 2016 Supplemental Notice of Proposed Rulemaking concerning Test Procedures for Central Air Conditioners and Heat Pumps (EERE-2009-BT-TP-0004).

Mr. McQuade explained that Johnson Controls (“JCI”) sought to comply with the Environmental Protection Agency’s 2010 rules and believed that those rules provided an orderly transition away from R-22 for manufacturers and homeowners. Mr. McQuade also discussed how the recent negotiations in Kigali, Rwanda impacted the R-407C issue.

Mr. Forth discussed JCI’s development of the R-407C series of products. He explained that JCI wanted to assist consumers that might be underserved during the R-22 phase out. Mr. Forth noted that R-407C is a non-ozone depleting, low GWP refrigerant. He further explained that JCI’s customers sought a replacement refrigerant in response to the increasing cost and unavailability of R-22.

Mr. Tice then gave a presentation that showed efficiency data for JCI’s R-407C units. Mr. Tice presented simulations showing the higher resulting system efficiencies when replacing the outdoor unit on an already installed JCI 10, 12, 13 and 14-SEER R-22 system with a JCI R-407C outdoor unit and using R-407C.

Mr. Nichols explained that the DOE’s proposed NGIFS requirements unintentionally favor some manufacturers’ choices and do not adequately measure coil efficiency.



The group then discussed DOE's approach to the proposal and comment process.

Submitted electronically by:

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